

1 NICHOLAS A. TRUTANICH  
2 United States Attorney  
3 Nevada Bar Number 13644  
JARED L. GRIMMER  
3 Assistant United States Attorney  
501 Las Vegas Boulevard South, Suite 1100  
4 Las Vegas, Nevada 89101  
Telephone: 702-388-6378  
5 jared.l.grimmer@usdoj.gov

6 *Attorneys for Plaintiff*  
7 *The United States of America*

8  
9 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

Case No. 2:21-mj-00140-NJK

11 v.  
12 Plaintiff,

**Stipulation for an Order**  
**Directing Probation to Prepare**  
**a Criminal History Report**

13 ANTONIO MANZO-MADRIGAL,  
aka “Tony Manzo-Madrigal,”  
aka “Antonio Manzo,”

14 Defendant.

15  
16 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.  
17 Trutanich, United States Attorney, and Jared L. Grimmer, Assistant United States  
18 Attorney, counsel for the United States of America, and Brandon C. Jaroch, Assistant  
19 Federal Public Defender, counsel for Defendant ANTONIO MANZO-MADRIGAL, that  
20 the Court direct the U.S. Probation Office to prepare a report detailing the defendant’s  
21 criminal history.

22 This stipulation is entered into for the following reasons:

23 1. The United States Attorney’s Office has developed an early disposition  
24 program for immigration cases, authorized by the Attorney General pursuant to the

PROTECT ACT of 2003, Pub. L. 108-21. Pursuant to this program, the government has extended to the defendant a plea offer in which the parties would agree to jointly request an expedited sentencing immediately after the defendant enters a guilty plea.

2. The U.S. Probation Office cannot begin obtaining the defendant's criminal history until after the defendant enters his guilty plea unless the Court enters an order directing the U.S. Probation Office to do so. Such an order is often entered in the minutes of a defendant's initial appearance when charged by indictment.

3. The U.S. Probation Office informs the government that it would like to begin obtaining the criminal history of defendants eligible for the early disposition program as soon as possible after their initial appearance so that the Probation Office can complete the Presentence Investigation Report by the time of the expected expedited sentencing.

4. Accordingly, the parties request that the Court enter an order directing the U.S. Probation Office to prepare a report detailing the defendant's criminal history.

DATED this 12th day of February, 2021.

Respectfully submitted,

NICHOLAS A. TRUTANICH  
United States Attorney

/s/ Brandon C. Jaroch  
BRANDON C. JAROCH  
Assistant Federal Public Defender  
Counsel for Defendant ANTONIO  
MANZO-MADRIGAL

/s/ Jared L. Grimmer  
JARED L. GRIMMER  
Assistant United States Attorney

1                   **UNITED STATES DISTRICT COURT**  
2                   **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

Case No. 2:21-mj-00140-NJK

4                   Plaintiff,

**Order Directing Probation to Prepare  
a Criminal History Report**

5                   v.

6 ANTONIO MANZO-MADRIGAL,  
7 aka "Tony Manzo-Madrigal,"  
aka "Antonio Manzo,"

8                   Defendant.

9  
10                  Based on the stipulation of counsel, good cause appearing, and the best interest of  
justice being served:

12                  IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a  
13 report detailing the defendant's criminal history.

14                  DATED this 16<sup>th</sup> day of February, 2021.

15                    
16                  HONORABLE NANCY J. KOPPE  
17                  UNITED STATES MAGISTRATE JUDGE